

FILED

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CLERK OF SUPERIOR COURT
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DEPUTY

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Pima County Computer No. 35364
State Bar No. 3559

5 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
6 IN AND FOR THE COUNTY OF COCHISE

7 STATE OF ARIZONA,
8 Plaintiff,

9 vs.

10 BRANDI RAE JORDAN,
11 Defendant.

NO. CR200800159; CR201800004 ✓

SECOND NOTICE TO THE COURT
REGARDING CHANGE OF PLEA
TRANSCRIPT AND MOTION FOR
EXTENSION OF TIME FOR FILING
ANY PETITION FOR POST
CONVICTION RELIEF

12
13
14 _____ (Judge Hoggatt)

15 Counsel for the Defendant hereby informs the Court that he received Catherine S.
16 Berger's Affidavit dated September 12, 2018, and, thereafter, contacted her
17 telephonically. Ms. Berger said that she had a disc of the subject proceeding, but no
18 longer had the software necessary for displaying the disc. However, she knew of several
19 court reporters who may still have this software and agreed to contact them and attempt
20 to have the disc opened and a transcript prepared.
21

22 Counsel recently received an email from Ms. Berger providing Counsel with the
23 Transcript that she had prepared, but without the Court Reporter's Certification. The
24 Transcript appears to Counsel to be complete. She informed Counsel that she would send
25 it to the Clerk's Office "...as is as soon as I get a template for the certificate..."
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2 Counsel recently left a telephonic message for Ms. Berger and sent her an email,
3 along with a template for the certification, asking her if had filed the Transcript. Counsel
4 has not yet heard back from Ms. Berger, but, based upon previous experience, expects the
5 Transcript to be certified and sent to the Court.
6

7 Counsel requests an extension of sixty (60) days to file any Petition for Post
8 Conviction Relief, in both of the Cases herein (CR200800159; CR201800004) from the
9 current deadline of November 26, 2018.
10

11 WHEREFORE, for the foregoing reasons, with extraordinary circumstances,
12 Defendant respectfully requests this Court extend the time for filing any Petition in these
13 matters until January 28, 2019.
14

15 DATED this 2nd day of November, 2018.

16 LAW OFFICES OF JOHN WILLIAM LOVELL, P.C.

17 By: 
18 John William Lovell

19 CC:

20 Honorable Wallace R. Hoggatt
21 Judge, Cochise County Superior Court
22 P. O. Box CK
Bisbee, AZ 85603

23 Deputy Cochise County Attorney
24 Post Office Drawer CA
Bisbee, AZ 85603
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Catherine Berger, Court Reporter
425 Animas Creek Road
Caballo, NM 87931

Brandi Rae Jordan, #184411
ASPC – Perryville
Santa Cruz Unit
P. O. Box 3200
Goodyear, Arizona 85338

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